

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

IN RE GLOBAL BROKERAGE, INC. f/k/a  
FXCM INC. SECURITIES LITIGATION

Master File No. 1:17-cv-00916-RA-BCM

**CLASS ACTION**

---

This Document Relates To: All Actions

---

**NOTICE OF MOTION AND MOTION FOR CLASS CERTIFICATION AND  
APPOINTMENT OF CLASS REPRESENTATIVES AND CLASS COUNSEL**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the Declaration of Joshua Baker and its accompanying exhibits, Court-appointed Lead Plaintiffs 683 Capital Partners, LP and Shipco Transport Inc., and named plaintiff Sergey Regukh, who together are proposed class representatives, move the Court, before the Honorable Ronnie Abrams, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 1506, New York, New York, 10007, for an Order:

1. certifying this action pursuant to Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure as a class action;
2. defining the Class as:

All persons and/or entities that purchased or otherwise acquired publicly traded Global Brokerage, Inc., f/k/a FXCM Inc. (“FXCM”) securities, including FXCM 2.25% Convertible Senior Notes due 2018 and Class A common stock, during the period March 15, 2012 through February 6, 2017, both dates inclusive.

Excluded from the Class are: (i) Defendants; (ii) current and former officers, employees, consultants and directors of FXCM and FXCM Holdings, LLC; (iii) siblings, parents, children, spouses, and household members of any person excluded under (i) and (ii); (iv) any entities affiliated with, controlled by, or more than 5% owned by, any person excluded under (i) through (iii); and (v) the legal representatives, heirs, successors or assigns of any person excluded under (i) through (iv).

3. appointing Lead Plaintiffs 683 Capital Partners, LP and Shipco Transport Inc. and named plaintiff Sergey Regukh as Class Representatives for the Class;
4. appointing The Rosen Law Firm, P.A. as Class Counsel; and
5. granting such other and further relief as the Court deems necessary and proper.

Dated: January 6, 2020

**THE ROSEN LAW FIRM P.A.**

By: /s/ Phillip Kim

Laurence M. Rosen

Phillip Kim

Joshua Baker

275 Madison Avenue, 40th Floor

New York, New York 10016

Telephone: (212) 686-1060

Fascimile: (212) 202-3827

Email: lrosen@rosenlegal.com

pkim@rosenlegal.com

jbaker@rosenlegal.com

*Lead Counsel for Plaintiffs and the Proposed Class*

**WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP**

Matthew M. Guiney

270 Madison Ave.

New York, NY 10016

Tel: (212) 545-4600

Email: guiney@whafh.com

*Additional Counsel*

**CERTIFICATE OF SERVICE**

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On January 6, 2020, I served true and correct copies of the foregoing NOTICE OF MOTION AND MOTION FOR CLASS CERTIFICATION AND APPOINTMENT OF CLASS REPRESENTATIVES AND CLASS COUNSEL, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 6, 2020, at New York, New York.

*/s/ Joshua Baker*  
\_\_\_\_\_  
Joshua Baker